

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	
)	23 CR 283
IMAN BAMBOOYANI,)	Judge Martha M. Pacold
)	
)	
Defendant.)	

**IMAN BABMOOYANI'S UNOPPOSED MOTION TO
MODIFY CONDITIONS OF BOND**

NOW COMES Defendant, IMAN BAMBOOYANI, through his counsel, JOSHUA B. ADAMS, and respectfully requests this Honorable Court modify the conditions of his release and permit Mr. Bambooyani to travel to Los Angeles, California, from December 29, 2025, and returning to Chicago on January 6, 2026. In support of his motion, Mr. Bambooyani states the following.

1. Mr. Bambooyani is currently on pre-trial release with restrictions on travel within the Northern District of Illinois.
2. Mr. Bambooyani has pled guilty and awaiting sentencing.
3. Counsel has reached out to Pre-Trial Services but has not received a response. When Mr. Bambooyani has made requests to travel in the past, Pre-Trial Services has not objected with the provision that Mr. Bambooyani provides his itinerary to his assigned officer.
4. The Government does not object to this request.

Respectfully submitted,

/s/Joshua B. Adams

Joshua B. Adams

Counsel for Iman Bambooyani

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